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February 24, 2017

William Pratt
International Metals Ekco, Ltd
17420 Nordhoff
Northridge CA 91330

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Richard Keenberg
Ekco Metals
2846 Commercial Street
San Diego, CA 92113

Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter
Ekco Metals Violations of General Industrial Permit

Dear Mr. Keenberg:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) regarding International Metals Ekco, Ltd ("Ekco")'s violations of the State Water Resources Control Board Water Quality Order Nos. 97-03-DWQ and 2014-0057-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (Industrial Permit).¹ This letter constitutes CERF's notice of intent to sue for violations of the Clean Water Act and Industrial Permit for Ekco's facility located at 2846 Commercial St, San Diego, CA 92113 ("Facility"), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of Ekco's Clean Water Act violations and CERF's intent to sue.

I. Coastal Environmental Rights Foundation (CERF)

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and defense of the environment, the wildlife, and the natural resources of the

¹ The Industrial Permit amendments, pursuant to Order No. 2014-0057-DWQ, become effective July 1, 2015. All references are to the Industrial Permit prior to modification pursuant to Order No. 2014-0057-DWQ are to the "Industrial Permit." All references to the Permit as modified by Order No. 2014-0057-DWQ are to the "New Industrial Permit."

California Coast. Members of CERF use and enjoy the waters into which pollutants from Ekco's ongoing illegal activities are discharged, namely Chollas Creek, San Diego Bay, and the Pacific Ocean.

The public and members of CERF use Chollas Creek, San Diego Bay, and the Pacific Ocean to fish, sail, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the Ekco Facility affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and will continue to be adversely affected by Ekco Owners and/or Operators' failure to comply with the Clean Water Act and the New Industrial Permit.

II. Storm Water Pollution and the Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the Industrial Permit in order to lawfully discharge. Ekco enrolled as a discharger subject to the New Industrial Permit on June 16, 2015 with WDID No. 9 371024803. Ekco originally enrolled under the Industrial Permit on April 15, 2014.

Pursuant to the Industrial Permit, a facility operator must comply with all conditions of the Industrial Permit. Failure to comply with the Industrial Permit is a Clean Water Act violation. (Industrial Permit, § C.1; New Industrial Permit §XXI.A. ["Permit noncompliance constitutes a violation of the Clean Water Act and the Water Code..."]). Any non-compliance further exposes an owner/operator to an (a) enforcement action; (b) Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of a Industrial Permit renewal application. (*Id.*). As an enrollee, Ekco has a duty to comply with the Industrial Permit and is subject to all of the provisions therein.

B. The Ekco Facility Discharges Contaminated Storm Water in Violation of the Industrial Permit

Discharge Prohibition A(2) of the Industrial Permit and Section III.C. of the New Industrial Permit prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance. Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. In addition, receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges, which cause or contribute to an exceedance of any water quality standards, such as the CTR or applicable Basin Plan water quality standards. (See New Industrial Permit, §III.D.; §VI.A.). "The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard." (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an exceedance of such a standard, including the CTR.'" (*Id.* at 927).

If a discharger violates Water Quality Standards, the Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards. (Industrial Permit, Fact Sheet p. viii; New Industrial Permit, §XX.B.1; 33 U.S.C. § 1311(b)(1)(C)). The Ekco Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Ekco SWPPP pursuant to section New Industrial Permit Section XX.B.

The monitoring data for the Ekco Facility indicates consistent, ongoing exceedances and violations of the Industrial Permit. The Ekco Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of the above listed prohibitions and limitations during every significant rain event. Ekco's sampling data reflects numerous discharge violations. Ekco's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

As reflected below, the Facility has exceeded the CTR and benchmarks during every significant rain event.

No.	Discharge Point	Date	Parameter	Units	Result	Benchmark/WQO	NAL
1	1	9/15/2015	Aluminum	mg/L	.900	.75 ¹	.75
2	1	9/15/2015	Iron	mg/L	2.41	1.0	1.0
3	1	9/15/2015	Copper	mg/L	.580	.013 ²	.0332
4	1	9/15/2015	Zinc	mg/L	.570	.12 ²	.26
5	2	9/15/2015	Copper	mg/L	.550	.013 ²	.0332
6	2	9/15/2015	Zinc	mg/L	.870	.12 ²	.26
7	1	1/5/2016	Zinc	mg/L	.130	.12 ²	.26
8	1	1/5/2016	Copper	mg/L	.034	.013 ²	.0332
9	2	1/5/2016	Zinc	mg/L	.180	.12 ²	.26
10	2	1/5/2016	Copper	mg/L	.030	.013 ²	.0332
11	2	1/5/2016	Iron	mg/L	1.45	1.0 ¹	1.0

¹ EPA 2015 Multi Sector General Permit Benchmark, Table 8.N

² California Toxics Rule Limit

Every day the Ekco Owners and/or Operators discharged or continue to discharge polluted storm water in violation of the Discharge Prohibitions and Receiving Water Limitations of the New Industrial Permit is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The Ekco Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since Ekco's enrollment. These violations are ongoing and will continue each day contaminated storm water is discharged in violation of the requirements of the Permit.

C. Failure to Develop and/or Implement BMPs that Achieve Compliance with Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology

The New Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges and authorized non-storm water discharges through implementation of the Best Available Technology Economically Achievable (BAT) for toxic pollutants² and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants.³ Specifically, the Permit "requires control of pollutant discharges using BAT and BCT to reduce and prevent discharges of pollutants, and any more stringent effluent limitations necessary for receiving waters to meet applicable water quality standards." (New Industrial Permit, §I.D.32; see also, §V.A.).

EPA Benchmarks are the pollutant concentrations which generally indicate whether a facility has successfully developed or implemented BMPs that meet the BAT/BCT. Discharges with pollutant concentration levels above EPA Benchmarks and/or the CTR demonstrate that a facility has failed to develop and/or implement BMPs that achieve compliance with BAT for toxic pollutants and BCT for conventional pollutants. The Facility's monitoring data demonstrates consistent exceedances of not only the CTR, but also EPA benchmarks. (See monitoring data above).

Thus, Ekco's storm water discharge sampling data demonstrates the Facility has not developed and/or implemented BMPs that meet the standards of BAT/BCT. (See *Baykeeper*, *supra*, 619 F.Supp. 2d at 925 ["Repeated and/or significant exceedances of the Benchmark limitations should be relevant" to the determination of meeting BAT/BCT]).

Further, information available to CERF indicates Ekco has failed to implement and/or develop BMPs that meet BAT and BCT. As noted in the Facility's SWPPP, minimal, ineffective advanced BMPs are used at the Facility. (SWPPP, p. 41). Notably, no filtration devices are installed to address the Facility's discharge of metals. (*Id.*). CERF's investigation also reveals extensive scrap metal and waste materials exposed (without implementation of BMPs) during rain events, as well as Facility storm water runoff visibly contaminated with sediment and oil and grease. (See Exhibit B, Photo, January 7, 2016).

Notably, Permit Effluent Limitation V.A. is a separate requirement, independent of the iterative process triggered by exceedances of the Permit's NALs. "The NALs are not intended to serve as technology-based or water quality-based numeric effluent limitations. The NALs are not derived directly from either BAT/BCT requirements or receiving water objectives." (New Industrial Permit, §I.M.63). Thus, the NALs do not represent technology-based criteria relevant to determine whether an industrial facility has implemented BMPs that achieve BAT/BCT. Therefore, development of an Exceedance Response Action Plan pursuant to Permit Section XII neither addresses nor alleviates the aforementioned violations of Effluent Limitation V.A.

In summary, the Ekco Owners and/or Operators are seriously in violation of Section V.A.

² Toxic pollutants are found at 40 CFR § 401.15 and include, but are not limited to: lead, nickel, zinc, silver, selenium, copper, and chromium.

³ Conventional pollutants are listed at 40 CFR § 401.16 and include biological oxygen demand, total suspended solids, pH, fecal coliform, and oil and grease.

of the Industrial Permit. Every day Ekco operates with inadequately developed and/or implemented BMPs in violation of the BAT/BCT requirements is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311 (a)). Therefore, Ekco has been in daily and continuous violation of the BAT/BCT requirements of the Industrial Permit every day since at least February 24, 2012, and is subject to penalties for all such violations.

These violations are ongoing and Ekco will continue to be in violation every day it fails to develop and/or implement BMPs that achieve BAT/BCT to prevent or reduce pollutants associated with industrial activity in storm water discharges at the Facility.

D. Inadequate Storm Water Pollution Prevention Plan

One of the main requirements of the Industrial Permit (and New Industrial Permit) is the Storm Water Pollution Prevention Plan (SWPPP). (Industrial Permit §A; New Industrial Permit, Finding I.54, §X). Ekco has not developed an adequate SWPPP as required by the New Industrial Permit.

The Ekco SWPPP dated December 2016 fails to adequately assess the Facility's potential contribution of 303(d) listed pollutants to receiving waters. Per section X.G.2.a.ix of the New Industrial Permit, the Ekco Owners and/or Operators are required to assess the potential industrial pollutant sources to receiving waters with 303(d) listed impairments identified in Appendix 3. (New Industrial Permit, §X.G.2.a.ix). The SWPPP identifies the following 303(d) listings for Ekco receiving waters: copper, lead, diazinon, indicator bacteria, phosphorus, total nitrogen, zinc, trash, PAHs, chlordane, total coliform, enterococcus, and fecal coliform. (SWPPP, p. 4). Though the SWPPP identifies the numerous pollutants for which the receiving waters are listed, it summarily dismisses the potential presence of such pollutants at the Facility without explanation. (SWPPP, pp. 46-47). This is completely inadequate, especially because the EPA Fact Sheet for Sector N specifically identifies nitrogen as a potential pollutant associated with scrap and waste recycling facilities.⁴

The SWPPP further acknowledges the use and presence of magnesium at the Facility. (SWPPP, p. 19). However, the SWPPP fails to include this constituent as part of the Facility's monitoring protocol, in violation of the New Industrial Permit. (New Industrial Permit, §XI.B.6.c.; see SWPPP, p. 16, Table 4).

Lastly, despite the numerous and egregious water quality violations established by Ekco's monitoring data, the SWPPP BMPs have not been updated to address such exceedances.

Every day the Ekco Owners and/or Operators operate the Facility without an adequate SWPPP constitutes a separate and distinct violation of the Industrial Permit, the New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The Ekco Owners and/or Operators have been in daily and continuous violation of the Industrial Permit since at least June 12, 2015. These violations are ongoing and the Ekco Owners and/or Operators will continue to be in violation every day they fail to address the SWPPP inadequacies. Thus, the Ekco Owners and/or Operators are liable for civil penalties of up to \$37,500 per day for

⁴ https://www.epa.gov/sites/production/files/2015-10/documents/sector_n_scraprecycling.pdf

violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Failure to Monitor

The Ekco Owners and/or Operators have failed to sample as required during the 2014-2015 wet season, and all prior rain events beginning in March 2008, when the Facility first started operating in the City of San Diego. Though Ekco failed to enroll from 2008 to mid-2014, it was nonetheless required to enroll and comply with the terms of the Permit – including its monitoring requirements.⁵

Sections B(5) and (7) of the Industrial Permit required dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Ekco Owners and/or Operators, were required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples were to be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility. No rain events were monitored from 2008 to mid-2015, though there were numerous qualifying rain events. (See Exhibit A, Precipitation Data).

The New Industrial Permit requires dischargers to take two samples between July 1 and December 31 and two samples between January 1 and June 30. (New Industrial Permit, §XI.B.2). Indeed, the Ekco SWPPP specifically acknowledges this requirement. (SWPPP, p. 45). The SWPPP also states the Facility “has prepared a site-specific storm water monitoring program for this facility to maintain compliance with the [New Industrial Permit].” (SWPPP, p. 16). Nonetheless, Ekco has failed to comply with these requirements. (See 2015-2016 Annual Report, Question 3). Notably, SA Recycling, located at 3055 Commercial Street, was able to sample on October 7, 2015 and November 4, 2015.

Ekco has also failed to sample the requisite number of qualified storm events for the first half of the 2016-2017 year. Ekco has failed to submit any monitoring data since its January 5, 2016 rain event.⁶ Again, there were numerous qualifying storm events and Ekco’s neighbor, A&B Truck Recycling, was able to sample at 11:15 AM on March 7, 2016. (See Exhibit A, Precipitation Data).

Lastly, Ekco’s failure to sample for magnesium, nitrate, nitrite and total nitrogen, and phosphorous – constituents that are likely present at the Facility and for which receiving waters are listed – constitutes an additional violation of the New Industrial Permit. (New Industrial

⁵ By failing to submit a NOI, the Ekco Facility has been operating in violation of the Clean Water Act since it began local operations in 2008. (See *Humboldt Baykeeper v. Union Pac. R.R. Co.*, 2006 U.S. Dist. LEXIS 88984 (N.D. Cal.2006) “[a]ny person who discharges or proposes to discharge pollutants ... and who does not have an effective permit, except persons covered by general permits ..., must submit a complete application to the Director ...”, citing 40 CFR § 122.21). Ekco’s failure to file a NOI and its continued unpermitted discharge of pollutants constitute separate and distinct violations of the Clean Water Act. (*Humboldt Baykeeper*, supra, at p. 88984 [claim for unpermitted discharge of pollutants and another for a failure to obtain a NPDES permit were two claims with “distinct legal viability.”]).

⁶ If Ekco has conducted the required sampling but failed to upload the data to SMARTS, this also constitutes a violation of the New Industrial Permit. (New Industrial Permit, §XI.B.11.a).

Permit, §XI.B.6.c.).

Every day the Ekco Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing and the Ekco Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. The Ekco Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

F. Inadequate Level 1 ERA Report

The Ekco Level 1 ERA Report, dated December 23, 2016, is woefully inadequate. As a preliminary matter, the Report incorrectly summarizes the NAL exceedances. (Level 1 ERA Report, p. 1). The New Industrial Permit requires dischargers to take the average of all results for the entire Facility. (New Industrial Permit, §XII.A.1.). However, this does not mean analytical results for *all discharge points* at a Facility should be combined and averaged. Rather, the New Industrial Permit prohibits combining discharges: “samples from different discharge locations shall not be combined or composited except as allowed in Section XI.C.5 (Qualified Combined Samples).” (New Industrial Permit, §XI.B.9). Ekco does not conduct qualified combined sampling for the Facility. Therefore, averaging of sampling data for all discharge points is neither logical nor permitted. Further, the reported average result for copper is miscalculated. (Level 1 ERA Report, p. 1, Table 1).

Ekco has also failed to provide any technical information regarding application of the REM zeolite wattle for reduction of total metals, including copper, iron and zinc. (Level 1 ERA Report, p. 4, Table 4). Notably, because Ekco has failed to conduct the requisite monitoring under the New Industrial Permit, it has failed to analyze the adequacy of its Level 1 ERA Report or new BMPs.

Every day the Ekco Owners and/or Operators fail to submit an adequate Level 1 ERA Report is a separate and distinct violation of the New Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). These violations are ongoing and the Ekco Owners and/or Operators will continue to be in violation every day they fail to revise and submit an appropriate Level 1 ERA Report.

G. Unauthorized Non-Storm Water Discharges

Except as authorized by Section IV of the New Industrial Permit, permittees are prohibited from discharging materials other than storm water (non-storm water discharges) either directly or indirectly to waters of the United States. (New Industrial Permit, §III.B.; IV.A-B).

Information available to CERF indicates that unauthorized non-storm water discharges occur at the Facility due to inadequate BMP development and/or implementation necessary to prevent these discharges. For example, unauthorized non-storm water discharges occur from the Facility's irrigation, washing and cleaning activities. The Ekco Owners and/or Operators conduct these activities without BMPs to prevent related non-storm water discharges. Non-storm water discharges resulting from washing and cleaning are not from sources that are

listed among the authorized non-storm water discharges in Section IV.A. of the Permit. Further, the San Diego Regional Municipal Separate Storm Sewer System (MS4) Permit Section E.2.a. prohibits the discharge of unauthorized non-storm water as an illicit discharge.

These discharge violations are ongoing and will continue until the Ekco Owners and/or Operators develop and implement BMPs that prevent prohibited non-storm water discharges or obtain separate NPDES permit coverage. Each time the Ekco Owners and/or Operators discharge prohibited non-storm water in violation of Discharge Prohibition III.B. of the Permit is a separate and distinct violation of the Storm Water Permit and section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). CERF will update the number and dates of violations when additional information becomes available. The Ekco Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since February 24, 2012.

III. Remedies

Upon expiration of the 60-day period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF is willing to discuss effective remedies for the violation noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF will move forward expeditiously with litigation.

Ekco must develop and implement a SWPPP which complies with all elements required in the New Industrial Permit, including the requisite monitoring, and address the consistent, numerous, and ongoing water quality violations at the Facility. Should the Ekco Owners and/or Operators fail to do so, CERF will file an action against Ekco for its prior, current, and anticipated violations of the Clean Water Act.

CERF's action will seek all remedies available under the Clean Water Act §1365(a)(d). CERF will seek the maximum penalty available under the law which is \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF may further seek a court order to prevent Ekco from discharging pollutants. Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF will seek to recover all of its costs and fees pursuant to section 505(d).

IV. Conclusion

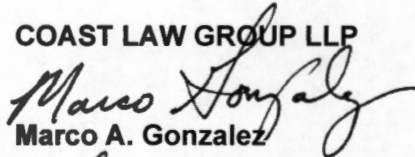
CERF has retained legal counsel to represent it in this matter. Please direct all communications to Coast Law Group:

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1140 S. Coast Highway 101
Encinitas, CA 92024
Tel: (760) 942-8505 x 102
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CERF will entertain settlement discussions during the 60-day notice period. Should you wish to pursue settlement, please contact Coast Law Group LLP at your earliest convenience.

Sincerely,

COAST LAW GROUP LLP


Marco A. Gonzalez



Livia Borak Beaudin

Attorneys for

Coastal Environmental Rights Foundation

CC:

Alexis Strauss Acting Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA, 94105	Dave Gibson, Executive Officer Catherine Hagan, Staff Counsel San Diego Regional Water Quality Control Board 2375 Northside Drive, Suite 100 San Diego, CA 92108-2700
Catherine McCabe Acting EPA Administrator William Jefferson Clinton Building 1200 Pennsylvania Avenue N.W. Washington, DC 20004	Thomas Howard Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0110
International Metals Ekco Ltd P O Box 23188 Los Angeles, CA 90023	

EXHIBIT A

STATION	STATION_NAME	ELEVATION	LATITUDE	LONGITUDE
GHCND:USW00023188	SAN DIEGO INTERNATIONAL AIRPORT CA US	4.6	32.73361	-117.18306

DATE	PRCP
20080105	0.88
20080106	0.37
20080107	0.35
20080121	0.1
20080123	0.68
20080126	0.32
20080127	0.4
20080203	0.25
20080214	0.21
20080222	0.45
20080224	0.22
20080316	0.22
20080523	0.11
20080524	0.1
20081004	0.18
20081104	0.14
20081126	1.05
20081127	1.26
20081215	0.88
20081216	0.17
20081217	1.6
20081222	0.39
20081225	0.26
20090205	0.17
20090206	0.23
20090207	1.41
20090209	0.37
20090216	0.36
20090322	0.14
20091128	0.12
20091207	1.56
20091212	0.15
20091213	0.43
20100118	1.06
20100119	0.53
20100120	0.64
20100121	0.74
20100122	0.22
20100123	0.1
20100205	0.12
20100206	0.55
20100209	0.33
20100220	0.34
20100227	0.73
20100306	0.26
20100307	0.42
20100401	0.56
20100405	0.11

20100412	0.68
20100421	0.27
20101006	0.74
20101019	0.91
20101020	0.1
20101025	0.15
20101030	0.15
20101120	0.53
20101121	0.19
20101219	0.13
20101220	0.31
20101221	2.01
20101222	1.83
20101225	0.12
20101229	0.46
20110102	0.24
20110216	0.28
20110218	0.56
20110219	0.35
20110226	0.82
20110320	0.79
20110321	0.13
20110323	0.34
20110409	0.14
20110518	0.19
20111005	0.42
20111104	0.59
20111112	1.4
20111120	0.92
20111212	0.51
20111213	0.29
20120123	0.27
20120207	0.29
20120214	0.22
20120215	0.26
20120227	0.37
20120317	0.35
20120318	0.13
20120319	0.13
20120325	0.28
20120411	0.12
20120413	0.28
20120425	0.36
20120426	0.1
20121012	0.45
20121021	0.14
20121108	0.14
20121130	0.1
20121213	1.56
20121215	0.12
20121224	0.12
20130106	0.16

20130125	0.85
20130126	0.15
20130208	0.27
20130219	0.26
20130307	0.18
20130308	1.04
20130506	0.18
20131029	0.16
20131121	0.97
20131122	0.49
20131207	0.1
20131219	0.34
20140206	0.2
20140227	0.14
20140228	0.51
20140301	1.01
20140302	0.24
20140402	0.22
20140426	0.16
20141101	0.25
20141202	0.42
20141203	0.27
20141204	1.84
20141212	1.05
20141216	0.43
20141217	0.41
20150111	0.2
20150112	0.17
20150222	0.14
20150228	0.1
20150301	0.68
20150302	0.25
20150508	0.46
20150514	1.63
20150515	0.21
20150718	1.03
20150719	0.66
20150915	1.21
20151004	0.14
20151005	0.27
20151103	1.09
20151127	0.18
20151211	0.19
20151213	0.16
20151219	0.11
20151222	0.17
20151228	0.19
20160104	0.14
20160105	1.65
20160106	0.61
20160107	0.56
20160131	0.14

20160306	0.1
20160307	0.45
20160311	0.15
20160407	0.31
20160410	0.17
20160506	0.34
20160920	0.15
20160921	0.16
20161120	0.11
20161121	0.12
20161126	0.11
20161127	0.17
20161128	0.1
20161215	0.12
20161216	1.2
20161221	0.54
20161222	0.56
20161224	0.6
20161230	0.51
20161231	0.68
20170105	0.16
20170109	0.18
20170112	0.32
20170113	0.35
20170119	0.19
20170120	1.11
20170122	0.35
20170123	0.22
20170207	0.11
20170217	1.07

EXHIBIT B





